

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

UNITED STATES OF AMERICA)	Crim. No. <u>9:21-cr-00317-DCN</u>
)	
)	18 U.S.C. § 922(g)(1)
)	18 U.S.C. § 924(a)(2)
v.)	18 U.S.C. § 924(e)
)	18 U.S.C. § 1594(c)
)	18 U.S.C. § 1591(a)(1)
)	18 U.S.C. § 1591(b)(2)
)	18 U.S.C. § 1591(c)
)	18 U.S.C. § 1594(d)
)	18 U.S.C. § 1594(d)(1)
)	18 U.S.C. § 1594(d)(2)
)	18 U.S.C. § 2251(a)
)	18 U.S.C. § 2251(e)
)	18 U.S.C. § 2253
)	18 U.S.C. § 2
)	18 U.S.C. § 924(d)(1)
)	28 U.S.C. § 2461(c)
CEDRICK VENTIEGO RILEY)	
EARL DAWSON CALDWELL, IV,)	
a/k/a “Chuck Ashley”)	SUPERSEDING INDICTMENT
JESSICA MICHELLE MILLS)	
)	<u>UNDER SEAL</u>

COUNT 1

THE GRAND JURY CHARGES:

That on or about May 7, 2021, in the District of South Carolina, the Defendant, **CEDRICK VENTIEGO RILEY**, knowingly possessed a firearm and ammunition in and affecting commerce, to wit, a Smith and Wesson, model SD40VE, .40 caliber pistol and .40 caliber ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

1. Beginning at a date unknown to the Grand Jury but from at least in or about the Fall of 2020 through May of 2021, in the District of South Carolina, the Defendants, **CEDRICK VENTIEGO RILEY, EARL DAWSON CALDWELL, IV, a/k/a "Chuck Ashley," and JESSICA MICHELLE MILLS**, knowingly in and affecting interstate commerce, did combine, conspire, confederate, agree and have a tacit understanding with each other to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means, a person, knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe the person, that such person had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1);

Manner and Means

2. It was part of the conspiracy that the conspirators enticed Minor Victim One to engage in commercial sex acts.

3. It was further part of the conspiracy that the conspirators harbored Minor Victim One for the purpose of facilitating commercial sex acts of Minor Victim One.

4. It was further part of the conspiracy that the conspirators used vehicles, public highways, hotels, telephones, and the internet to facilitate the commercial sex acts.

All in violation of Title 18, United States Code, Section 1594(c).

COUNT 3

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but at least in the Fall of 2020, through in or about May of 2021, in the District of South Carolina, the Defendant, **JESSICA MICHELLE MILLS**, in and affecting commerce, knowingly did recruit, entice, harbor, provide, obtain, and maintain Minor Victim One, having had a reasonable opportunity to observe Minor Victim One and knowing and in reckless disregard of the fact that Minor Victim One had not attained the age of 18 years, and knowing and in reckless disregard that Minor Victim One would be caused to engage in a commercial sex act; and knowingly did advertise Minor Victim One knowing that Minor Victim was under the age of 18 years old and knowing that Minor Victim One would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), and 1594(a).

COUNT 4

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but at least in the Fall of 2020, through in or about May of 2021, in the District of South Carolina, the Defendant, **CEDRICK VENTIEGO RILEY**, in and affecting commerce, knowingly did entice, harbor, provide, obtain, and maintain Minor Victim One, having had a reasonable opportunity to observe Minor Victim One and knowing and in reckless disregard of the fact that Minor Victim One had not attained the age of 18 years, and knowing and in reckless disregard that Minor Victim One would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), and 1594(a).

COUNT 5

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but at least in or about December of 2020, through in or about May of 2021, in the District of South Carolina, the Defendant, **EARL DAWSON CALDWELL, IV, a/k/a "Chuck Ashley,"** in and affecting commerce, knowingly did entice, harbor, transport, provide, obtain, maintain, patronize, and solicit Minor Victim One, having had a reasonable opportunity to observe Minor Victim One and knowing and in reckless disregard of the fact that Minor Victim One had not attained the age of 18 years, and knowing and in reckless disregard that Minor Victim One would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), and

1594(a).

COUNTS SIX - EIGHT

THE GRAND JURY FURTHER CHARGES:

On or about the dates set forth below, in the District of South Carolina, the Defendant, **EARL DAWSON CALDWELL, IV, a/k/a "Chuck Ashley,"** did knowingly employ, use, persuade, and entice a minor, namely Minor Victim One, to engage in sexually explicit conduct (as defined in 18 U.S.C. § 2256(2)) for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce; and the visual depiction was transported in interstate commerce;

Count	Dates	Visual Depiction Electronic File
6	December 10, 2020	9A33D7BE-D996-468A-B316-EB9185F4F71F
7	December 10, 2020	30B10B74-FCDB-4E66-90A9-51524B97F2B9
8	January 4, 2021	IMG_1109

All in violation of Title 18, United States Code, Sections 2251(a) and 2.

FORFEITURE

FIREARM OFFENSE:

Upon conviction for the felony violation of Title 18, United States Code, Section 922(g)(1) as charged in this Superseding Indictment, the Defendant, **CEDRICK VENTIEGO RILEY**, shall forfeit to the United States all of the Defendant's rights, title, and interest in:

(a) any firearms and ammunition (as defined in 18 U.S.C. § 921) –

(1) involved in or used in any knowing violation of 18 U.S.C. § 922, or violation of any other criminal law of the United States, or intended to be used in a crime of violence.

HUMAN TRAFFICKING/PROSTITUTION:

Upon conviction for violation of Title 18, United States Code, Section 1591, as charged in this Superseding Indictment, the Defendants, **CEDRICK VENTIEGO RILEY, EARL DAWSON CALDWELL, IV, a/k/a "Chuck Ashley," and JESSICA MICHELLE MILLS**, shall forfeit to the United States any property used or intended to be used, in any manner or part, to commit or facilitate the commission of the offenses, and any property, real or personal, constituting, derived from or traceable to proceeds the Defendants obtained, directly or indirectly, as a result of such offenses.

CHILD PORNOGRAPHY:

Upon conviction for violation of Title 18, United States Code, Section 2251, as charged in this Superseding Indictment, the Defendant, **EARL DAWSON CALDWELL, IV, a/k/a "Chuck Ashley"**, shall forfeit to the United States his interest in:

- i. any visual depiction described in section 2251, 2251A, 2252 or 2252A of chapter 110 of the United States Code, or any book, magazine, periodical, film, videotape, or other matter which

contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of chapter 110 of the United States Code;

- ii. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and
- iii. any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses.

PROPERTY:

Pursuant to Title 18, United States Code, Sections 924(d)(1) 1594 and 2253, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Superseding Indictment includes, but is not limited to, the following:

A. Firearm:

Smith and Wesson, model SD40VE, .40 caliber
pistol
(Serial Number: FZY9472)

B. Ammunition:

Miscellaneous rounds of .40 caliber ammunition

C. Watercrafts:

- (1) 2019 Albury 23 CC Boat
Parcel Number: WC210089244
Owner: Earl Dawson Caldwell, IV
- (2) 2017 Yamaha 250 Boat Motor
Parcel Number: WC210089245
Owner: Earl Dawson Caldwell, IV

D. Vehicle:

2017 Toyota Land Cruiser
VIN: JTM CY7AJ1H4052358
Owner: Earl Dawson Caldwell, IV

E. Real Property:

1 Stump Hill Place
Sheldon, SC 29941
Owner: Stump Hill, LLC
Parcel ID: R700 035 000 0040 0000

F. Cash Proceeds/Forfeiture Judgment:

A sum of money equal to all proceeds the Defendants obtained, directly or indirectly, from the offenses charged in this Superseding Indictment, and all interest and proceeds traceable thereto, and/or that such sum equals all property involved in or traceable to their violations of Title 18.

SUBSTITUTE ASSETS:

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of defendants up to an amount equivalent to the value of the above-described forfeitable property;

All pursuant to Title 18, United States Code, Sections 924(d)(1), 1594 and 2253, and Title 28, United States Code, Section 2461(c).

A True BILL



FOREPERSON

J

M. Rhett Dehart

M. RHETT DEHART (JCH)
ACTING UNITED STATES ATTORNEY